

Attachment 1
SECOND INTERNAL DRAFT
Key Differences between Current Protocol and Second Draft

ACTION	CURRENT PROTOCOL	DRAFT
ANNUAL REPORT	Annual report for SHPO requires different information from annual report to Washington; two reports must be generated.	BLM annual report to the Washington Office would also serve as the annual report to SHPO.
DOCUMENT ORGNIZATION	Organization not as closely tied to steps in processing an undertaking and consulting. Requires jumping around in document to follow process.	Organized to follow more closely the order in which undertakings are processed.
DETERMINATIONS OF ELIGIBILITY	BLM's evaluation of properties eligible under Criteria A, B, and C require consultation with SHPO. This results in SHPO review of project documentation in cases in which it may be determined that there would be no adverse effect to these properties.	BLM would make all determinations of eligibility regardless of applicable eligibility criteria. These determinations would not be reviewed by SHPO unless BLM determines that historic properties would be adversely affected.
DETERMINATIONS OF EFFECT	Some determinations of "no effect" require a 15-day SHPO review. Determinations of adverse effect require 30-day SHPO review. Determinations of effect on all sites eligible under Criteria A, B, and C require 30-day SHPO review.	BLM would make all determinations of effect. Only those undertakings for which BLM determines that historic properties would be adversely affected would require consultation with SHPO. SHPO estimates that number of projects going through required review would be reduced by 90%.
SUBMISSION OF DOCUMENTATION TO SHPO	All projects for which adverse effects to historic properties are identified, or in which properties eligible under Criteria A, B, and C are identified must go to SHPO for review, with formal cover letter. SHPO then sends to WYCRO.	Projects that result in a determination of "no historic properties affected," submit directly to WYCRO with a CRMTracker generated cover sheet. No formal cover letter would be required. These projects would not be reviewed by SHPO on an individual basis but spot reviewed for quality assurance. SHPO estimates this to be 90% of caseload.
DATA RECOVERY PLANS/REPORTS	SHPO review is 30 days.	SHPO review time for data recovery plans/reports for Criterion D sites would be 15 days.
MEMORANDA OF AGREEMENT	Conflicting interpretation between BLM and SHPO regarding this point. This is resolved in draft.	MOAs not required for data recovery on Criterion D sites or HABS/HAER documentation. Would substitute use of Conditions of Approval to ensure completion of data recovery plan requirements.
DISCOVERY PLANS	All discovery plans require consultation and 30-day review.	Routine discovery plans would not be reviewed by SHPO.